



MEMO ENDORSED

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**VIA ECF**

February 19, 2020

Hon. Kenneth M. Karas  
United States District Court  
Southern District of New York  
United States Courthouse  
300 Quarropas Street  
White Plains, NY 10601

Re: *Mobile Real Estate, LLC and John Lim v. Newpoint Media Group, LLC, et al.*  
Docket No.: 7:19-cv-11475

Dear Judge Karas:

We represent the plaintiffs, Mobile Real Estate, LLC and John Lim, in the above referenced matter.

Following the Pre-Motion Conference held before the Court on February 6, 2020, we filed our motion to stay and/or vacate arbitration with this Court on February 18, 2020 pursuant to the Briefing Schedule. Contemporaneously, we advised the American Arbitration Association and the defendants that the motion to stay and/or vacate arbitration was filed and that we respectfully decline to take further action until the motions are decided.

In response, counsel for defendants Kathryn E. Isted, Esq., acknowledged that a Briefing Schedule has been established in the New York federal case, but insisted that arbitration proceed as, "there is no indication on when the court will rule on the motions."

Thereafter, February 19, 2020 the American Arbitration Association by Allyson Connor responded that "absent a court order staying this matter, AAA will proceed with administration" and issued further directives.

The email chain is attached as Exhibit "A".

Accordingly, while we were of the opinion that the Briefing Schedule was an Order, we respectfully request the issuance of an Order temporarily staying the arbitration until such time as this Court decides the motions.

Thank you for your attention to this matter.

Respectfully submitted,




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Encl: *Saracino email February 18, 2020 11:29 AM*  
*Isted response email February 18, 2020 6:08 PM*  
*AAA response email February 19, 2020 9:31 AM*

Defendants are to respond to  
this request by 3 p.m. tomorrow,  
February 20, 2020.

So ordered.

  
2/19/2020